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June 15, 1999

HAND DELIVERY

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W., Room TW-B204
Washington, D.C. 20554

Re: **In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability Proposed Rulemaking**

Dear Ms. Salas:

Pursuant to Section 1.419 of the Commission's rules, transmitted herewith, on behalf of Prism Communication Services, Inc. are an original and four (4) copies of its comments in the above referenced proceeding

A "Stamp In" copy of this filing is also enclosed. Please date-stamp the "Stamp In" copy and return it to the courier delivering this package. If there are any questions regarding this filing, please contact the undersigned counsel.

Sincerely,

Renée Roland Crittendon

cc: Service list
Terry Peck
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rrc/enclosures

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ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Deployment of Wireline Services Offering	)	**CC Docket No. 98-147**
Advanced Telecommunications Capability	)	
	)	
	)	

COMMENTS OF PRISM COMMUNICATION SERVICES, INC.

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Dated: June 15, 1999

SUMMARY OF THE ARGUMENT

In these comments, Prism encourages the Commission to rely upon existing industry standards bodies for the development of long term spectrum compatibility standards and practices. Specifically, standards-setting bodies such as T1E1.4 are intimately familiar with loop spectrum management and compatibility issues, have already assumed the task of developing spectrum masks and other standards, and characterize their membership as open and balanced. Prism also encourages the Commission to advocate binder administration practices that are not overly restrictive, but integrate procedures which leave the door open to new innovations. Prism believes industry standards bodies are in the best position to maintain and update binder group administrative practices so as to minimize interference with future technologies. The Commission should also, however, allow operators to use their own mutually agreed upon models and guidelines for spectrum management, provided they are technically sound, nondiscriminatory, and widely available.

Prism also recommends that the Commission replace interfering technologies as soon as practicable, with least disruption to the network and existing customers. In this regard, any disputes should be addressed within an accelerated forum to provide carriers with some degree of certainty regarding the assessment of offending technologies. Additionally, in light of the potential for delay with consensus-structured standards bodies, and the speed at which technology is evolving, Prism urges the Commission to mandate deployment practices that are not only effective and neutral, but also timely.

Finally, as discussed more fully below, while Prism supports the FCC's proposal to mandate line sharing, it urges the Commission to thoroughly examine the myriad of implementation issues -- technical, operational and economic-- that may arise. Specifically, a

database of qualified loops and access to currently kept OSS information is crucial if competitive carriers are to reach the marketplace in a timely fashion. As a general matter, Prism advocates good engineering practices, in conjunction with industry standard compatibility criteria.

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	)	
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COMMENTS OF PRISM COMMUNICATION SERVICES, INC.

Prism Communication Services, Inc. ("Prism"), by and through counsel, hereby submits its comments on the Federal Communications Commission's ("FCC" or "Commission") Further Notice of Proposed Rulemaking in the above-referenced proceeding concerning long-term standards and practices for spectrum compatibility and line sharing.[1]

I. INTRODUCTION

The Commission issued this FNPRM and companion First Report and Order for the purpose of removing barriers to competition and adopting measures to promote competition in the advanced services markets. The Commission noted that it believed that the measures taken in the instant proceeding would create incentives for advanced service providers to innovate, develop and deploy new technologies.[2] The Commission indicated that the ability of

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[1] *See In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability*, Further Notice of Proposed Rulemaking, CC Docket No. 98-147, FCC 99-48 (released March 31, 1999) ("FNPRM").

[2] *FNPRM* at ¶ 4.

vendors and competitive carriers to provide additional service offerings on a more efficient and expeditious basis, would benefit consumers with lower prices and increased choices in advanced services.[3]

In its Order, the Commission first expanded its collocation rules to reduce the costs and delays faced by competitors seeking to collocate their equipment in the central office ("CO") of an incumbent local exchange carrier ("ILEC"). The FCC also adopted spectrum compatibility rules to allow for the rapid deployment of advanced services technology by competitive providers. In this latter regard, the Commission indicated that any loop technology that complies with existing industry standards, has been successfully deployed by any carrier without significantly degrading the performance of other services, or has been approved by the FCC or a state commission, will be presumed acceptable for deployment.[4] To address the potential delay in the standards development process, the Commission proposed a "test and see" strategy to encourage competitive LECs ("CLECs") and ILECs to cooperate in testing and deployment.[5] The Commission also stated that the burden would be placed on the ILEC to demonstrate to state commissions when the deployment of a particular technology, presumed acceptable for deployment, would significantly degrade the performance of other services. In addition, the

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[3] *Id.* at ¶ 4.

[4] *Id. at* ¶ *8.*

[5] *Id. at* ¶ *77.*

Commission concluded that incumbent LECs must provide CLECs with nondiscriminatory access to the ILEC's spectrum management procedures and policies.[6]

In the FNPRM, the Commission requests comments regarding what measures might facilitate the timely development of long-term industry standards and practices on spectrum compatibility and management to further the development of new and innovative loop technologies.[7] The Commission also tentatively concludes that line sharing is technically feasible, and seeks comments on operational, pricing and policy issues to determine whether line sharing should be mandated nationally.[8] In sum, through the instant proceeding, the Commission takes steps to ensure a marketplace for advanced services that is conducive to investment, innovation and meets the needs of consumers.

A. Summary of Prism's Operations

Prism is an advanced communications company using innovative consumer digital modem ("CDM") technology to provide high-speed data, voice and Internet connectivity across the existing copper telephone infrastructure. Prism is a next-generation communications provider in that it offers its customers both local and long-distance telephone services in addition to reliable high-speed access to the Internet or corporate "intranets." Prism's use of CDM technology requires neither central-office rewiring nor installation of a voice/data splitter. CDM technology represents one of the least expensive ways for carriers to upgrade their existing

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6 *Id. at ¶ 72.*

7 *Id. at ¶8.*

8 *Id. at ¶ 8.*

switch infrastructure to support high-speed data and voice over a single twisted pair cooper wire. CDM technology is "loop friendly" with existing and future services in that it is spectrally compatible with the T1.413 power spectral density ("PSD") mask which defines the technical standard for the provision of ADSL (asymmetric digital subscriber line) and other like services. Because the technology is designed to a tighter mask than xDSL services, it does not interfere with itself or other DSL services. Further, because CDM technology is "loop friendly," it requires only the unbundled local loop and does not require any special loop conditioning.

As noted above, Prism supports the Commission's intent to establish specific spectrum management and compatibility rules and advocates the use of line sharing in general. Nevertheless, Prism urges the Commission to take a hard look at the interference and operational issues raised, as well as the processes and methodologies to be developed in mandating line sharing.

II. DISCUSSION

A. The Commission Should Rely Upon Existing Standards-Setting Bodies To Develop Long Term Spectrum Compatibility Standards and Practices.

With regard to the issue of spectrum compatibility, the Commission tentatively concludes that the standards-setting process should be competitively neutral both structurally and procedurally; that representation in the process should be equitable; and that active participation by all sectors of the industry is central to the process.[9] Prism supports these tentative conclusions.

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[9] *Id. at* ¶ 79.

As an initial matter, Prism strongly advocates the use of existing industry standard bodies to develop long term standards and practices. As such, Prism urges the Commission to refrain from involving itself in the unnecessarily stifling and bureaucratic task of directing industry bodies to develop spectrum management policies. To begin with, as the Commission has itself acknowledged, standards-setting bodies such as T1E1.4 are open to all vendors and carriers and, with greater involvement, may be potentially representative of the industry at large.[10] Further, the Commission's stated congressional goal in this proceeding -- promoting innovation and investment by all participants in the telecommunications marketplace to stimulate competition for advances services[11] -- can be met successfully without excessive government oversight.

Specifically, standards bodies such as the T1E1.4 working group exist for the purpose of developing standards and technical reports for high-speed, digital facilities. The scope of the T1E1.4 group includes developing standards and technical reports for transmission techniques, user interfaces, and interface functionality for transmission services providing access to telecommunications networks.[12] In drafting its reports and standards, this group considers and develops mechanical and electromagnetic characteristics of interfaces, and aspects of physical layer transmission and signaling protocols.[13] The group characterizes itself as an organization that is not dominated by any single interest, and widely advocates a policy of open membership

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10 *Id. at ¶ 84-85.*

11 *Id. at ¶ 1.*

12 *See Working Group T1E1.4 Digital Subscriber Line Transmission Mission and Scope* (last modified Mar. 5, 1999) <http://www.tl.org/tlel/_e14home.htm>.

13 *Id.*

and balanced participation to safeguard the integrity and efficiency of the standards formulation process.[14]

Significantly, standards bodies like T1E1.4 are steadily and consistently progressing, with the input of the industry, to develop technical standards regarding interconnection and interoperability of telecommunications networks at interfaces with end-user systems, carriers, information and enhanced service providers, and customer premises equipment. In this context, the involvement of the Commission in directing industry bodies such as T1E1.4, would appear to serve no legitimate or significant purpose. Instead, Prism believes that the Commission may meet its legislative objective to stimulate competition for advanced services by (1) enforcing its policy that any loop technology that meets or exceeds existing or developed industry standards, or which has been successfully deployed, is presumed acceptable for deployment; (2) relying on and encouraging industry bodies such as T1E1.4 to develop compatibility standards in a timely, fair, and open manner; and (3) continuing to serve as an arbitrator of disputes involving spectrum compatibility issues.

While Prism acknowledges and concurs with the concerns of commenters that T1E1.4 is not representative of competitive carriers, the working group is comprised of a large number of vendors with great incentive to keep polices and practices balanced. Rather than forming a new standards organization at this time -- an endeavor that will only cause additional delay – Prism urges the Commission to foster broader participation in existing industry bodies such as T1E1.4 by leading periodic roundtable discussions or otherwise encouraging industry dialogue.

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[14] *See T1 Overview* (viewed June 10, 1999) <http.//www.tl.org/html/intro.htm>. *See also T1 Members* (last modified June 1, 1999) <http.//www.tl.org/html/t1member.htm>.

B. Spectrum Compatibility And Management Practices Must Be Effective, Non Restrictive, and Developed On a Timely Basis.

In its FNPRM, the Commission requests comments regarding what methods may be used to address spectrum compatibility that will not restrict deployment of technologies that otherwise would not harm the network.[15] In this respect, the Commission seeks comments on whether generic masks would be an appropriate means to address compatibility issues, and whether T1E1.4 should be responsible for developing future PSD masks.[16]

Prism agrees with the Commission's assessment that spectral masks are an effective means to minimize cross-talk or other degradations. The generic mask is a particularly appropriate way to lay out spectral bands without causing undue interference and the use of such masks will not restrict demodulation techniques or unduly limit design options. On the other hand, technology specific spectral masks, while allowing for a myriad of technologies, may cause some delays in the standards development process. Accordingly, Prism advocates the use of generic masks in the near term -- leaving open the option of utilizing more technology specific methods in the future. Prism also believes that a calculation-based approach may provide an additional and more accurate tool for defining spectral compatibility since this approach is derived from cable crosstalk and receivers models rather than spectral masks which are static. However, whatever method is ultimately used, Prism believes that to the extent any approach to

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15 *FNPRM* at ¶ 82.

16 *Id.* at ¶¶ 81-82.

defining spectral compatibility complies with an accredited industry standards body and is technology neutral, it should be deemed acceptable.[17]

Moreover, as noted above, the T1E1.4 working group has assumed the task of developing spectrum masks and is intimately familiar with loop spectrum management issues. Accordingly, T1E1.4 appears to be in the best position, at this time, to undertake long term PSD mask standards. Prism would reiterate, however, that the Commission should not preclude consideration of similar standards developed by other accredited industry bodies. In either case, the Commission must set clear guidelines and timetables so as not to leave the standards process open-ended. Rather, the Commission should emphasize the need to accelerate the standards development process in order to bring advanced services to market more rapidly.

With regard to spectrum management, it is the Commission's intention that the rules developed pursuant to the instant proceeding will encourage technical innovation while preserving network reliability.[18] Prism agrees with the Commission's initial determination that it should serve to facilitate industry development of fair and open deployment practices.[19] However, as in the case of spectrum compatibility, spectrum management practices should take into account the speed at which technology is evolving and incorporate a sense of urgency. Since industry bodies are typically consensus-structured, there is ample opportunity for

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[17] As an additional measure for ensuring significant and meaningful compliance, a certification process may also be implemented in order to give service providers added confidence regarding interference levels.

[18] *Id.* at ¶ 84.

[19] *Id. at ¶ 84.*

participants to delay the adoption of guidelines. The failure to formulate management practices in a timely manner will ultimately result in delays for new innovations and stall the deployment of advanced services. Accordingly, the Commission should be cognizant of this real and potential problem and set definitive timelines.

As part of its evaluation of spectrum management issues, the Commission seeks specific comments regarding binder administration, including specifications on the type and numbers of technologies that can be deployed so as to maximize the deployment of new technologies within binder groups while minimizing interference.[20] In Prism's view, binder administration practices should not be overly restrictive but should integrate procedures which leave the door open to new innovations. The goal should be to foster competition and multiple choices for consumers and service providers while preserving the integrity of the network. In this regard, Prism recommends that services defined as being spectrally compatible should be allowed to be deployed in any number within a binder group. It may be efficient in some circumstances, to segregate like services in a single binder group where those services cause less harm than other services. For example, the Commission might allow ILECs to segregate more broadly xDSL technologies according to their crosstalk compatibility where cable capacity permits, as a means of maximizing loop plant utilization. Where practical, binder group separation may be implemented according to the draft Spectrum Management standard (T1E1.4/99-002R3) guidelines. However, the Commission and industry bodies must heed CLEC concerns that

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[20] *Id. at ¶ 86.*

incumbents may segregate services solely for the purpose of deterring CLEC offerings and afford CLECs some protection.

With respect to the procedures for maintaining and updating binder group administrative practices to minimize interference with future technologies, Prism believes that this task is best left to industry bodies. The Commission may initially delegate this task to the Technical Committee T1E1.4 working group, but should allow operators to use their own mutually agreed upon models and guidelines for spectrum management, provided they are technically sound, nondiscriminatory, and widely available. In addition, the Commission need not solicit the assistance of a third party in developing spectrum management policies, but, as noted previously, may rely on standards-setting bodies for technical decisions, and on itself for general policy and enforcement.

The Commission also seeks comment on whether to establish a grandfathering process for interfering technologies, as well as a dispute resolution process to address the existence of disturbers in shared facilities.[21] In the case of interfering technologies, including AMI T1, Prism recommends that such technologies be replaced as soon as practicable. While the disruption of existing subscribers' services is of concern, maximizing noninterference -- both for existing and future services -- should be the market's primary purpose. In the area of dispute resolution, Prism believes that disputes are best resolved by the Commission via an expedited review

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[21] *Id. at ¶ 87-88.*

process such as the *Rocket Docket*.[22] A swift and effective framework for disputes regarding degradation of the network is crucial to the viability of advanced service offerings. In particular, a forum for prompt resolution of interference disputes will provide carriers with a degree of certainty and minimize the use of offending technologies.[23]

C. Prism Supports The Adoption Of Line Sharing, Provided That The Associated Technical, Operational And Costing Issues Are Fully Addressed.

In its FNPRM, the Commission tentatively concludes that it has the authority to mandate line sharing and to require ILECs to provide requesting carriers with access to the transmission facilities above that used for analog voice service.[24] In the FCC's opinion, line sharing will prompt the rapid deployment of advanced services by making it possible for a competing carrier to offer advanced services over the same line the ILEC provides the consumer with voice service.[25] The Commission indicated that shared line access will enable providers to enter the market and offer services at no greater costs than those incurred by the ILEC since customers may access high-speed digital services via their existing phone line.[26] Further, new entrants can offer only advanced services, obviating the need to expend resources or expertise on

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22 *See In the Matter of Implementation of the Telecommunications Act of 1996, Amendment of Rules Governing Procedures to Be Followed When Formal Complaints are Filed Against Common Carriers*, 12 FCC Rcd. 22497 (released November 25, 1998) ("Rocket Docket").

23 The Commission might also adopt informal procedures similar to those utilized in the broadcast and satellite arena for isolating the cause of the interference, prior to any formal remedies. *See 47CFR § 95.861 (Interactive Video and Data Services)* & § 25.274 (Earth Stations).

24 *FNPRM* at ¶¶ 98-99.

25 *Id. at ¶ 93, 96.*

26 *Id.* at ¶ 93.

the provision of analog voice services.[27] The FCC has also tentatively concluded that any rules adopted will not mandate a particular technological approach to the use of a line for multiple services[28] and that line sharing is technically feasible.[29] Prism supports the Commission's tentative conclusions as well as its public interest incentives for making line sharing widely available. In particular, the absence of line sharing will require a dual investment by competitive carriers as new entrants will be forced to over build access to the physical loops, making the provision of advanced services prohibitively impossible. However, as discussed more fully below, there are a number of implementation issues that must be thoroughly examined before line sharing is mandated.

The Commission first seeks comments on several technical issues regarding line sharing. To begin with, the Commission questions whether it should more precisely define what constitutes the frequency above that used for analog voice service.[30] In this regard, Prism does not advocate the use of hard frequency boundaries between the voice and data portions of the line, since such boundaries may, in the long run, deny carriers the opportunity to use the loop to provision services that rely on different frequency bands within the loop. Instead, good engineering practices, in conjunction with industry-standard compatibility criteria should be

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27 *Id.*

28 *Id.* at ¶ 101.

29 *Id.* at ¶ 103.

30 *FNPRM* at ¶ 100.

implemented. Prism notes, however, that if the Commission ultimately carves out a portion of the loop for voice, it should also leave open the opportunity to revisit that definition in the future.

Second, the Commission seeks commentary on its tentative conclusion that where an ILEC can demonstrate that digital loop conditioning would interfere with the voice service of the line, line sharing is not technically feasible.[31] Prism believes this policy is insufficient as it fails to impose on ILECs a more meaningful demonstration; namely, the identification of those loops that are suitable for high-speed services. In particular, incumbent LECs are fully capable of providing a database of qualified loops without extraordinary efforts.[32] Rather, the Commission should require ILECs to characterize loops in an automated fashion and determine whether particular loops are candidates for high-speed services. In addition, the Commission must ensure that the incumbent's operational support systems ("OSS"), many of which are antiquated, reflect what is actually on the lines and in the CO. The lack of such crucial information on a timely basis will block competitive carriers from reaching the marketplace and ensure that incumbents are the only carriers able to provide advanced services.

Finally, the Commission has requested comments regarding what effect line sharing will have on existing analog voice service, whether carriers should be allowed to request merely the voice channel of a line, and the effect of line sharing on OSS.[33] In Prism's view, the greatest risk imposed by line sharing is the threat to the continued protection of voice and 911 services. As

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31 *Id.* at 104.

32 Northern Telecom, Inc., for example, a leader in the development of xDSL technologies and an active participant in T1E1.4, provides electronic testing procedures which characterize loops for potential use for high-speed offerings with 90-99% certainty.

33 *FNPRM* at ¶ 105.

the Commission is well aware, the introduction of new high-speed services provided over twisted copper loops in the ILECs' networks raises the possibility of unwanted cross-talk or other degradations when different technologies are deployed within the same or adjacent binder groups. Under no circumstances should the implementation of line sharing disrupt the consumer's regulated voice service. In addition, while Prism believes that carriers should be allowed to request just the voice channel or any unused portion of a line, as noted above, access to OSS is vital to competitive carriers so that information regarding what may or may not be placed on a particular line is readily available.

The Commission also seeks answers to various operational and costing issues raised by mandating line sharing. Specifically, the Commission questions how carriers will coordinate and manage assignment, maintenance, repair and billing systems, as well as manage multiplexing equipment.[34] In addition, the Commission asks commenters to discuss the pricing consequences of line sharing and how shared lines might affect federal and state access charge regimes and universal service mechanisms.[35]

Regarding operational issues, it is highly probable that customers receiving voice and data services on a single line from multiple carriers may be uncertain of which carrier to contact regarding specific concerns. Prism recommends that for maintenance and repair, the carrier contacted by the end user should immediately handle the maintenance call and make any necessary repairs. This will ensure that technical difficulties are corrected immediately and that

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[34] *Id.*

[35] *Id.* at ¶ 106.

consumers' concerns are promptly addressed. Where the maintenance or repair problem was caused by another carrier, the carrier handling the maintenance call could simply bill the responsible carrier on a pro-rata basis. Prism also advocates allowing each carrier to handle its own billing systems so that end users receive a separate record for their voice and data services.

With regard to pricing and costing issues, Prism supports unbundled loop pricing that is both fair and pro-competitive so that new entrants view the advanced services marketplace as a justifiable business decision. Prism also supports the costing of line sharing on a platform, rather than on a UNE basis. Prism also submits that line sharing may cause prices to decline since the cost of the loop will be paid for by multiple parties – a benefit to the consumer of increased choices at lower prices. Likewise, to the extent additional carriers are sharing lines, contributions to the universal service fund should, at minimum remain revenue neutral, and are likely to grow.

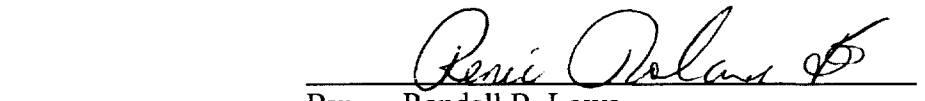
Finally, Prism notes that although carriers are increasingly deploying ATM and other packet technologies, the migration of voice from circuit-switched to IP or ATM networks will take time and require additional economic and technical considerations. As such, the CLEC's ability to deliver voice service over a packet-switched network does not obviate the need to share a loop with the ILEC.

CONCLUSION

In short, line sharing will promote the viability of new and emerging telecommunications companies by removing the cost disadvantage associated with the provision of advanced services over a stand-alone line. Additionally, significant compliance, flexibility in technology, and timeliness are elements that must be central to spectrum compatibility and management for the rapid deployment of advanced telecommunications services. Prism supports the actions the Commission has taken in this proceeding to promote competition in the advanced services market, and urges the Commission to carefully contemplate the policies, processes and methodologies by which it will implement its proposed measures.

Respectfully submitted,

PRISM COMMUNICATION SERVICES, INC.



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Dated: June 15, 1999

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Comments of Prism Communication Services, Inc. was sent via hand-delivery to the individuals on the attached service list, this 15th day of June, 1999.

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